

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Allen B. Morris,

CHAPTER 13

Debtor

CASE NO. 17-10740-ref

Santander Consumer USA

Movant

vs.

Allen B. Morris,

Debtor

William C. Miller Trustee

ANSWER TO CERTIFICATION OF DEFAULT OF SANTANDER CONSUMER USA FOR RELIEF FROM
AUTOMATIC STAY

Debtor, by and through his attorney, Brenna Hope Mendelsohn, Esquire, hereby responds to this
Certification of Default of Santander Consumer USA as follows:

1. Debtor avers that payments under the Stipulation filed with this Honorable Court will be current
by the hearing date and respectfully requests this Honorable Court conduct a Hearing with
respect to the default.

Respectfully Submitted,

Dated: August 22, 2018

By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
Attorney for Debtor